# UNITED STATES DISTRICT COURT FOR THE DISTRICT OF PUERTO RICO

JUAN CARLOS LOPEZ, CARLOS
VILLEGAS, HECTOR LUCIANO
RODRIGUEZ, FRANCO MONROUREAU,
JUAN MIGUEL CAMARERO, JOEL
ALMESTICA, EFRAIN GARCIA, ANGEL
RODRIGUEZ, EDWIN BAEZ-TORRES,
ORLANDO ACETTY BERMUDEZ, LUIS
ALBERTO AYALA-DIAZ, JOSE
MORALES-DIAZ, JUAN ALBERTO
VARGAS, WILSON TORRES RIVERA, and
BETHZAIDA SIERRA GONZALEZ, as
Successor-in-Interest of the Estate of
GABRIEL COTTO, Deceased

Case No. 17-cv-01154-WGY

Hon. William G. Young

Plaintiffs,

 $\mathbf{V}$ 

MANZANA, LLC and LAWRENCE WILLIAMS,

Defendants.

Natasha Lycia Ora Bannan Latino Justice PRLDEF

Attorneys for Plaintiffs 99 Hudson Street, 14th floor New York, NY 10013 212.739.7583 | Fax: 212.431.4276 nbannan@latinojustice.org

Kara K. Moberg
Managing Attorney
Farmworker Legal Services
3030 South 9th Street, Suite 1A
Kalamazoo, MI 49009
Tel: (269) 492-7190
Fax: (269) 492-7198
kmoberg@farmworkerlaw.org

Wilma Reveron Collazo USDC-PR 204802 P.O. Box 9023317 San Juan, P.R. 00902-3317 John M. Lichtenberg (P31770)
Jacqueline M. Appleman (P79014) **Rhoades McKee PC**55 Campau Avenue NW, Suite 300
Grand Rapids, MI 49503
616.235.3500 | Fax 616.233.5269
jmlichtenberg@rhoadesmckee.com
jmappleman@rhoadesmckee.com

Jason R. Aguiló-Suro **Pietrantoni Mendez & Alvarez, LLC**Banco Popular Center 19th Floor
208 Ponce de Leon Ave
San Juan, PR 00918
787.274.5244 | Fax: 787.274.1470
jaguilo@pmalaw.com

Tel: (787) 613-4036 wilmarc@prtc.net

# JOINT STIPULATION FOR ORDER OF DISMISSAL WITH PREJUDICE AND WITHOUT COSTS OR FEES

- 1) Plaintiffs and Defendants have compromised and resolved all claims asserted by Plaintiffs in their Complaint (and all amendments thereto) in the captioned case and have stipulated as part of such resolution that this cause is voluntarily dismissed with prejudice pursuant to Rule 41(a).
- 2) This dismissal is by the parties' stipulation and pursuant to Fed.R.Civ.P. 41(a)(1)(A)(ii).
- 3) The dismissal is with prejudice, and without the imposition of interests, costs or attorney's fees.

**WHEREFORE**, the appearing parties very respectfully request that the Honorable Court dismiss the Complaint with prejudice pursuant to Fed.R.Civ.P. 41(a)(1)(A)(ii), and with each party bearing its own respective costs and attorney's fees, and that judgment be entered accordingly to close this case.

#### RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 12th day of March, 2019.

**I HEREBY CERTIFY**: That on this date a true and exact copy of the foregoing document has been filed with the Clerk of Court using the CM/ECF system, which automatically serves notification of the filing to all parties of interest.

/s/ Natasha Lycia Ora Bannan
New York Bar No. 5021167
Pro hac vice
LatinoJustice PRLDEF
99 Hudson Street, 14th Floor
New York, NY 10013
Tel. (212) 739-7539
nbannan@latinojustice.org

/s/ Wilma E. Reveron Collazo

USDC-PR 204802 P.O. Box 9023317 San Juan, P.R. 00902-3317

Tel: (787) 613-4036 wilmarc@prtc.net

#### ATTORNEYS FOR PLAINTIFFS

### RHOADES MCKEE PC

55 Campau Avenue NW, Suite 300 Grand Rapids, MI 49503 616.235.3500 | Fax 616.233.5269

/s/ John M. Lichtenberg

(admitted *pro hac vice*)
John M. Lichtenberg
Michigan Bar No. P31770
jmlichtenberg@rhoadesmckee.com

/s/ Jacqueline M. Appleman

(admitted *pro hac vice*)
Jacqueline M. Appleman
Michigan Bar No. P79014
jmappleman@rhoadesmckee.com

### PIETRANTONI MENDEZ & ALVAREZ LLC

Popular Center, 19th Floor 208 Ponce De León Ave. San Juan, Puerto Rico 00918

Tel: (787) 274-1212 Fax: (787) 274-1470

/s/ Oreste R. Ramos

Oreste R. Ramos USDC-PR Bar No. 216801 oramos@pmalaw.com

/s/ Jason R. Aguiló Suro JASON R. AGUILÓ SURO USDC-PR Bar No. 227311 jaguilo@pmalaw.com

ATTORNEYS FOR DEFENDANTS